

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

M.A.,)	
)	
Plaintiff,)	
v.)	Case No. 3:20-cv-05218-FLW-LHG
)	
)	
WALL TOWNSHIP BOARD OF EDUCATION,)	Judge: Freda L. Wolfson
)	
Defendant.)	Magistrate: Lois H. Goodman
)	
)	MOTION DATE:

CERTIFICATION OF ROBERT C. THURSTON, ESQ.

I, Robert C. Thurston, Esq., declare and certify as follows:

1. I am an attorney at law, admitted to practice before this Court and co-counsel of record for Plaintiff in this matter.
2. I make this certification based on my own personal knowledge and am capable of testifying to all of the facts contained herein if called upon to do so.
3. I am an attorney licensed to practice in the State of New Jersey and I focus my practice in the field of special education law in that jurisdiction. My educational background and legal experience are accurately represented in my attached curriculum vitae. (A true and correct copy of a current cv is attached hereto as Exhibit A.)

4. As will be noted from my attached cv, I have handled cases at all levels, including appeals to the 3rd, 6th, and 9th Circuit Courts of Appeal and two petitions for certiorari to the U.S. Supreme Court. I have also handled several cases in this Court, as well as other federal district courts around the United States including without limitation Hawaii, Tennessee, and the U.S. Virgin Islands.

5. I am familiar with the fees charged by plaintiffs' counsel in special education, civil rights and disability matters in most of the jurisdictions within the United States Third Circuit. This is a highly complex area of law, requiring expertise in the substantive law of special education as well as litigation experience in both the administrative level as well as the state and federal court systems.

6. I was hired by Plaintiffs to work with their lead counsel John Rue & Associates to assist with this fee petition and the remand of the case to the OAL.¹

7. During the period of time that I was retained to represent Plaintiff in this matter, my established billing rate for this special education case was \$485.00 per hour. My regular established billing rate for special education cases is \$525.00 per hour, but agreed to charge a lower rate as I am assisting lead counsel.

8. In another matter, this Court approved my previous rates of \$375.00 and \$400.00 per hour and noted in its Opinion that those rates were on the lower

¹ The remand has not yet begun, but is expected to resume shortly. No fees have been charged to the remand portion of the case.


end of the market. *See Gresko v. Pemberton Twp. BOE*, U.S.D.C. D.N.J. Civil Action No. 1:19-cv-00638 (NLH)(KMW) (Opinion, U.S.D.J. Hillman, October 13, 2020, ECF #42, p. 24.)²

9. The Invoices reflecting my time working on this case on behalf of Plaintiffs up to the current date are attached hereto and reflect numerous hours of work at my billable rate of \$485.00 per hour totaling **\$13,531.50**. (True and correct copies of my invoices for this matter up to today are attached hereto as Exhibit B.)

10. The Invoices attached hereto represent my statements of professional services and detail the hours spent preparing and prosecuting this fee action and costs incurred.

11. Plaintiffs will continue to incur fees and costs in this fee petition case (“fees on fees”) the further this case progresses.

Dated: February 9, 2022

By: 
Robert C. Thurston, Esq.

² This opinion can be found online at Google Scholar at this link:
<https://bit.ly/33elBzy>

Exhibit A

Curriculum Vitae

EXHIBIT A

ROBERT C. THURSTON, ESQ.

Thurston Law Offices LLC
100 Springdale Road A3
PMB 287

Cherry Hill, NJ 08003
Work Phone: 856.335.5291

Email: rthurston@schoolkidslawyer.com

Web: schoolkidslawyer.com

PROFESSIONAL EXPERIENCE

Thurston Law Offices LLC

Cherry Hill, NJ (Prior locations in Pennsylvania and Illinois)

Attorney / Owner – November 2005 to Present

- Solo law practice with focus on special education law, family law, disability law, bankruptcy, and guardianships
- Recently published 2nd edition of book “SchoolKidsLawyer’s Step-By-Step Guide to Special Education Law”
- Substantial volunteer and *pro bono* legal work through South Jersey Legal Services
- 2007 *Pro Bono* Attorney of the Year awarded by the McHenry County (IL) Bar Association and Prairie State Legal Services

Prior experience

Available upon request

BAR ADMISSIONS

U.S. Supreme Court, 2018 (Active and in good standing)

State Bar of New Jersey, 1988 (Active and in good standing)

State Bar of Pennsylvania, 1987 (Retired)

State Bar of Illinois, 1992 (Retired)

U.S.C.A. 3rd Cir., 1989 (Active and in good standing)

U.S.C.A. 9th Cir., 2016 (Active and in good standing)

U.S.C.A. 6th Cir., 2019 (Active and in good standing)

U.S.D.C. D.N.J., 1988 (Active and in good standing)

U.S.D.C. E.D.Pa., 1989 (Retired)

U.S.D.C. M.D.Pa., 2015 (Active and in good standing)

U.S.D.C. N.D.Ill., 1993 (Retired)

U.S.D.C. N.D.Cal., 1993 (Inactive)

U.S.D.C. W.D.Mich., 1995 (Inactive)

U.S.D.C. D.Colo., 2011 (Inactive)

EDUCATION

Ohio State College of Law

Columbus, Ohio

J.D. 1987

Editor, Journal on Dispute Resolution

University of Michigan

Ann Arbor, Michigan

B.A. 1984 with Distinction

Economics and German

SELECTED RELEVANT CASE EXPERIENCE

Special Education Cases

1. U.S. Supreme Court

J.M., et al. v. Kathryn S. Matayoshi, et al., U.S. Sup. Ct. Case No. 18-641, Petition for Writ of Certiorari to the U.S. Supreme Court; Petitioner's counsel [Cert. Denied]

J.G., et al. v. State of Hawaii, Department of Education, et al., U.S. Sup. Ct. Case No. 19-658, Petition for Writ of Certiorari to the U.S. Supreme Court; Petitioner's counsel [Cert. Denied]

2. U.S. Courts of Appeal

K.K-M., et al. v. New Jersey Department of Education, et al., U.S.C.A. 3rd Circuit, No. 18-2535; Appellants' counsel [Briefed; No oral argument]

D.T., et al. v. Sumner County Schools, U.S.C.A. 6th Circuit, No. 19-5070; Appellants' counsel [Briefed; Oral Argument]

J.M., et al. v. Kathryn S. Matayoshi, et al., U.S.C.A. 9th Circuit, No. 16-17327; Appellants' counsel [Briefed; Oral Argument]

J.G., et al. v. State of Hawaii, Department of Education, et al., U.S.C.A. 9th Circuit, No. 18-16538; Appellants' counsel [Briefed; Oral Argument]

J.G., et al. v. State of Hawaii, Department of Education, et al., U.S.C.A. 9th Circuit, No. 17-17190; Appellants' counsel [Briefed; Oral Argument]

3. U.S. District Courts

J.A., et al. v. New Jersey Department of Education, et al. (Class Action), U.S.D.C. D.N.J., Civil No. 1:18-cv-9580-NLH-KMW; Lead counsel for Plaintiffs

J.A., et al. v. Monroe Twp. Board of Education, U.S.D.C. D.N.J., Civil No. 1:18-cv-14838-NLH-KMW; Lead counsel for Plaintiffs

K.K-M., et al. v. Gloucester City Public Schools, et al., U.S.D.C. D.N.J., Civil No. 1:17-cv-11579-RBK-KMW; Lead counsel for Plaintiffs

K.K-M., et al. v. Gloucester City Public Schools, et al., U.S.D.C. D.N.J., Civil No. 1:19-cv-15808-RBK-KMW; Lead counsel for Plaintiffs

M.D. and S.H. o/b/o L.D. v. Vineland City Board of Education d/b/a Vineland City Public Schools, U.S.D.C. D.N.J., Civil No. 1:19-cv-12154-NLH-JS; Lead counsel for Plaintiffs

Gresko, et al. v. Pemberton Twp. Board of Education, U.S.D.C. D.N.J., Civil No. 1:19-cv-00638-NLH-KMW; Lead counsel for Plaintiffs

D.T., et al. v. Sumner County Schools, et al., U.S.D.C. M.D.Tenn., Civil No. 3:18-cv-388; Lead counsel for Plaintiffs, *pro hac vice*

J.G., et al. v. State of Hawaii, Department of Education, et al., U.S.D.C. D.Hi., Civil No. 1:17-cv-00503-DKW-KSC; Lead counsel for Plaintiffs, *pro hac vice*

Howard G., et al. v. State of Hawaii, Department of Education, et al., U.S.D.C. D.Hi., Consolidated Civil Nos. 11-00523 DKW-BMK, 13-00029 DKW-BMK; Lead counsel for Plaintiffs on remand, *pro hac vice*

Regina Pangerl, et al. v. Peoria Unified School Dist., U.S.D.C. D.Ariz., Civil No. 2:14-cv-836-JJT; Lead counsel for Plaintiffs, *pro hac vice*

Joan-Ann Anthony, et al. v. Government of the Virgin Islands, Dept. of Education, U.S.D.C. D.V.I., Civil No. 3:11-91; Lead counsel for Plaintiffs, *pro hac vice*

4. State Appellate Courts

K.K-M., et al. v. Board of Education of the City of Gloucester City, Camden County, N.J. App. Div. Docket No. A-001158-18 (Residency Appeal); Lead counsel for Appellants

5. Administrative Agencies

K.K-M., et al. v. Gloucester City Public Schools, et al., New Jersey Office of Administrative Law, Docket Nos. EDS 18461-17 and 18462-17 [Consolidated]; Lead counsel for Petitioners

K.K-M., et al. v. Gloucester City Public Schools, et al., New Jersey Office of Administrative Law, Docket Nos. EDS 08360-2018 S, EDS 08361-2018 S, EDS 09245-2018 S, and EDS 09247-2018 S [Consolidated]; Lead counsel for Petitioners

K.K-M., et al. v. Gloucester City Public Schools, et al., New Jersey Office of Administrative Law, Docket Nos. EDS 08837-19 and EDS 08838-19 [Consolidated]; Lead counsel for Petitioners

J.A., et al. v. Monroe Twp. Board of Education, New Jersey Office of Administrative Law, Docket Nos. EDS 08588-17 and EDS 11524-18 [Consolidated]; Lead counsel for Petitioners

Monroe Twp. Board of Education v. J.A., et al., New Jersey Office of Administrative Law, Docket Nos. EDS 04281-2020 S; Lead counsel for Respondents

K.C., et al. v. Cherry Hill Twp. Bd. Of Education, New Jersey Office of Administrative Law, Docket No. 18463-17; Lead counsel for Petitioners

C.G. and J.G. o/b/o J.G. v. Pemberton Twp. Board of Education, New Jersey Office of Administrative Law, Docket No. EDS 06509-18; Lead counsel for Petitioners

A.G. and J.F.G. o/b/o J.G. v. Elsinboro Twp. School District, New Jersey Office of Administrative Law, Docket No. EDS 06801-18; Lead counsel for Petitioners

C.M. o/b/o L.S v. Monroe Twp. Board of Education, New Jersey Office of Administrative Law, Docket Nos. EDS 09541-18 and EDS 09544-18; Lead counsel for Petitioners

C.M. and J.M. o/b/o R.M. v. Monroe Twp. Board of Education, New Jersey Office of Administrative Law, Docket Nos. EDS 18349-18 and EDS 18350-18; Lead counsel for Petitioners

D.P. o/b/o K.P. v. Vineland City Board of Education d/b/a Vineland City Public Schools and Vineland Public Charter School, New Jersey Office of Administrative Law, Docket No. [UNASSIGNED/SETTLED]; Lead counsel for Petitioners

Cherry Hill Public School Dist. v. A.Y., et al., New Jersey Dept. of Education, OSEP, Docket No. 2016-24216; Lead counsel for Respondent

D.T., et al. v. Sumner County Schools, Tennessee Department of Administrative Procedures, Docket No. 07.03-152098J; Lead counsel for Petitioners, *pro hac vice*

J.G., et al. v. State of Hawaii, Department of Education, Hawaii Office of Administrative Law, DOE-SY1617-067A; Consulting counsel for Petitioners

P.M., et al. v. State of Hawaii, Department of Education, Hawaii Office of Administrative Law, DOE-SY1819-007; Consulting counsel for Petitioners

C.B., et al. v. School Dist. of Philadelphia, Pennsylvania Office of Dispute Resolution, File Number 16302-1415KE; Lead counsel for Petitioners

Other Federal Non-Special Education Cases of Note

Schuler, et al. v. TRS Recovery Services, Inc., et al., U.S.D.C. M.D.Pa., Civil No. 1:15-cv-2179-YK; Local counsel for Plaintiff in class action FDCPA case

Linatex Ltd. v. Heritage Maintenance Products, LLC, U.S.D.C. E.D.Pa., Civil No. 2:14-cv-06351; Local counsel for Plaintiff in trademark infringement case

TotalFacility, Inc., et al. v. Dabek, et al., U.S.D.C. E.D.Pa., Civil No. 2:14-cv-05324-CDJ; Local counsel for Defendants in contract dispute

Wells Fargo Bank, N.A. v. Siegel, U.S.D.C. N.D.Ill., Civil No. 05-civ-5635; Lead trial counsel for Defendant in alleged fraudulent futures options trading case (cited at 2007 WL 1686980)

Pintlar Corporation, et al. v. Lloyd's London, et al., U.S.D.C. D.Idaho, Civil No. 3:92-cv-00163-EJL; Lead counsel for Northbrook Ins. Co., *pro hac vice*, in insurance coverage case for environmental damage claims

Illinois Central Railroad Co. v. Lloyd's, London, et al., U.S.D.C. S.D.Ill., Civil No. 3:91-cv-00090-WLB; Lead counsel for International Surplus Lines Ins. Co. in insurance coverage case for noise-induced hearing loss FELA claims

Illinois Central Railroad Co. v. Lloyd's, London, et al., U.S.D.C. S.D.Ill., Civil No. 3:91-cv-00091-WLB; Lead counsel for International Surplus Lines Ins. Co. in insurance coverage case for environmental damage claims

Norfolk & Western Railway Co. v. Accident & Casualty, et al., U.S.D.C. W.D.Va., Civil No. 7:89-cv-00344-JCT; Lead counsel for Stonewall Ins. Co., *pro hac vice*, in insurance coverage case for noise-induced hearing loss FELA claims

Gross Metal Products, Inc. v. Metal Finishing Fabricators, Inc., et al., U.S.D.C. E.D.Pa., Civil No. 86-5364; Assistant Counsel for Defendant Bleckner & Bleckner Ins. Agency in insurance coverage / E&O case

PUBLICATIONS

Book: *SchoolKidsLawyer's Step-By-Step Guide to Special Education Law*, 2nd Edition, Amazin Blue Press LLC, 2020

Book: *SchoolKidsLawyer's Step-By-Step Guide to IEPs – For Teachers*, Amazin Blue Press LLC, 2020

Book: *SchoolKidsLawyer's Step-By-Step Guide to IEPs – For Parents*, Amazin Blue Press LLC, 2019

Book: *SchoolKidsLawyer's Step-By-Step Guide to Special Education Law*, Amazin Blue Press LLC, 2016

School Kids Law Blog

<http://schoolkidslawyer.com/skl-blog/>

Chapter: "The Solo Lawyer's Dilemma: Doing It All Without Staff," *Effectively Staffing Your Law Firm*, 2nd Ed., jennifer j. rose, Editor, American Bar Association, 2017

"Does Your Child's 'Ism' Qualify For Special Education?", Special-Ism.com, June 10, 2016, <http://special-ism.com/qualify-special-education/>

"What Every Parent Should Know About Mediation," Special Education Guide, January 2, 2014, <http://www.specialeducationguide.com/blog/what-every-parent-should-know-about-mediation/>

"Making a Complaint About Your Child's Special Education," Special Education Guide, December 5, 2013, <http://www.specialeducationguide.com/blog/making-a-complaint-about-your-childs-special-education/>

"Evaluating a Child for Disability: The Wrong Way and the Right Way," Special-Ism.com, December 2, 2013, <http://special-ism.com/evaluating-a-child-for-disability-the-wrong-way-and-the-right-way/>

“When Is It Time To Request An Independent Educational Evaluation (IEE)?,” Special Education Guide, September 25, 2013, <http://www.specialeducationguide.com/blog/when-is-it-time-to-request-an-independent-educational-evaluation-iee/>

“NJ’s Gov. Chris Christie is Dyslexics’ Hero?,” Special-Ism.com, September 3, 2013, <http://special-ism.com/nj-gov-chris-christie-is-dyslexics-hero/>

“When is it Time to Contact a Special Education Lawyer?,” Special Education Guide, August 27, 2013, <http://www.specialeducationguide.com/blog/when-is-it-time-to-contact-a-special-education-lawyer/>

“Playing (and Winning) the School District’s Game of Chicken,” Special Education Advisor, February 20, 2012, <http://www.specialeducationadvisor.com/playing-and-winning-the-school-districts-game-of-chicken/>

“The Technology Threat to Work/Life Balance,” American Bar Association GPSolo Magazine, September 2012, http://www.americanbar.org/publications/gp_solo/2012/september_october/technology_threat_work_life_balance.html

“Chapter 2: When You’re The Lawyer, Secretary, Receptionist and Janitor: Doing It All Without Staff,” *Effectively Staffing Your Law Firm*, ABA Publishing, 2009

“Prejudgment interest proposal issues debated – Pro: Statute would rectify injustice, follow a trend,” ISBA Bar News, February 2009

“[Art of the Business Meal or Mama Always Said . . .](#),” SOLO Newsletter, ABA GP | Solo and Small Firm Division, Vol. 12, No. 2, June 2006

“Tips for creating your own living will,” Huntley Journal (NW Herald), Page 25, Thursday, March 16, 2006

“Art of the Business Meal or Mama Always Said . . . “
SOLO Newsletter, ABA GP | Solo and Small Firm Division, Vol. 12, No. 2, June 2006

SEMINARS / PRESENTATIONS

Social Media, Ethics and Professionalism in Bankruptcy

Webinar via Zoom

South Jersey Legal Services, Inc.

June 11, 2020

cv Robert C Thurston, Esq.

Page 7 of 11

Ask The Expert (Facebook Live)
Decoding Dyslexia Wisconsin
September 25, 2018

The Case For A Private Cause of Action For Bullying
New Jersey Institute for Continuing Legal Education
New Jersey Law Center, New Brunswick, NJ
August 7, 2018

Legal Transition Options for Kids with Disabilities
LDANJ Spring Transitions Conference
Learning Disabilities Association of New Jersey
June 3, 2018

Getting Schools To Use "Dyslexia" In IEPs
Facets of Dyslexia Conference
Cooper Hospital Learning Center
Stratford, NJ
April 24, 2018

Transitions for Kids with Disabilities – Legal Perspective
Y.A.L.E. School
Cherry Hill, NJ
March 26, 2018

Aspects of Special Education Law
2018 Spring Parent Dyslexia Summit
Online: Simple Words Books
March 26, 2018

ESY and Compensatory Education: What They Are and How To Get Them
Families of Special Kids Network
Williamstown, NJ
February 24, 2018

How To Speak To Your Child's School To Meet The Special Needs, Remedial and Advanced
Barnes & Noble
Moorestown, NJ
November 28, 2017

Introduction to Special Education Law: Common Violations of Special Education Law By School Districts and What Parents Can Do To Fight For a Child's Rights
Families of Special Kids Network

Williamstown, NJ

October 23, 2017

Special Education Law Basics

South Jersey Paralegal Association

Mt. Laurel, NJ

May 23, 2017

Special Education Law and Advocacy Workshop Series

Decoding Dyslexia PA

Phoenixville, PA

April 27, 2017

Special Education Law Basics

Family Partners of Hudson County

Jersey City, NJ

January 24, 2017

Special Education Law 101

Workshop

Mt. Laurel, NJ

November 12, 2016

Special Education Law Basics

Family Services Organization of Burlington County

Lumberton, NJ

June 9, 2016

An Introduction to Special Education Law

Google Hangouts

May 26, 2016

Special Education Law Basics

Family Services Organization of Burlington County

Lumberton, NJ

November 9, 2015

Overview of Special Education Services – Lunch and Learn

General Electric Healthcare Women's Network

Princeton, NJ

May 22, 2014

What to Expect at an IEP/504 Meeting
MDA Greater Lehigh Valley Muscle Summit
Allentown, PA
November 9, 2013

Special Education Ethical Considerations: We're Not Your Mother's Ethics CLE
Pennsylvania Bar Institute / Exceptional Children Conference
Lancaster, PA
October 22, 2012

Autism Awareness
Immaculate Conception School
Chicago, IL
February 16, 2011

Estate Planning Basics
National Business Institute, Inc.
DeKalb, IL
December 17, 2008

Advising Business Clients
McHenry County Bankers Federation
Huntley, IL
June 10, 2008

Estate Planning: Beyond Probate
McHenry County Bankers Federation
Huntley, IL
September 11, 2007

Scanning for the OCR Challenged
Chicago Bar Association
Chicago, IL
January 12, 2007

Electronic Discovery: Managing the Data
Various Locations
2003-2004

Legal Research on the Internet
Various Locations
1997-1999

TEACHING EXPERIENCE

Comparative Business Entities for Paralegals, LEX 125

Fall 2020

Rowan College Burlington County, Mt. Laurel, NJ

Introduction to Bankruptcy Law for Paralegals, LEX 123

Spring 2020

Rowan College Burlington County, Mt. Laurel, NJ

Comparative Business Entities for Paralegals, LEX 125

Fall 2019

Rowan College Burlington County, Mt. Laurel, NJ

Business Law, BUS 240

Spring 2007

McHenry County College, Crystal Lake, IL

Legal Environment of Business, BUS 241

Academy – Fall 2006

McHenry County College, Crystal Lake, IL

Environmental Law for Paralegals, PLS 206

Spring 2006

Harper College, Palatine, IL

Exhibit B



EXHIBIT B

12/6/2021Project

\$873.00



Thurston Law Offices LLC
100 Springdale Rd A3
PMB 287
Cherry Hill NJ 08003

Invoice

Date	Invoice #
1/2/2022	2216

Bill To
M ^{REDACTED} A ^{REDACTED} c/o JOHN RUE & ASSOCIATES 1 Fairview Ave, Ste 14 Phillipsburg, NJ 08865-1230

Due Date
1/2/2022

Project	
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Service Date	Description	Time	Amount
12/2/2021	Review accounting and other billing information in preparation of fee application;	1.1	533.50
12/3/2021	Prepare Exhibit A re omnibus agreement and case strategy; legal strategy conference and case file discussion;	0.4	194.00
12/3/2021	Legal strategy and discussion re transition of case and remand issues;	0.2	97.00
12/3/2021	Receive and review via email file transfer memo; legal analysis re status of file and updated tasks;	0.4	194.00
12/3/2021	Legal analysis re claims and strategy discussion with co-counsel;	0.4	194.00
12/7/2021	Correspondence exchange and legal analysis re status of pro forma on fees for settlement demand;	0.3	145.50
12/7/2021	Review billings in preparation for pro forma for both settlement discussion and fee petition as necessary; begin preparation of consolidated pro forma fees;	1.4	679.00
12/7/2021	Receive and review via email supplemental pro formal billing information to update settlement demand and potential fee petition;	0.5	242.50
12/8/2021	Continued review of billings in preparation for pro forma for both settlement discussion and fee petition as necessary; amend and supplement preparation of consolidated pro forma fees; email to co-counsel for review and comment;	0.6	291.00
12/9/2021	Amend and supplement pro forma with redactions and other legal protections for purposes of settlement; email to JRA re same;	1.8	873.00
12/9/2021	Receive and review via email correspondence with settlement demand to district counsel and attaching redacted fees pro forma; analysis re same;	0.3	145.50
12/10/2021	Receive and review multiple correspondence re settlement discussions and tolling filing of fee petition pending negotiations; prepare letter application to Judge Wolfson for 30 day tolling of filing fee petition and proposed Order; receive and review objections of WTBOE counsel re language in proposed Order; amend proposed Order; file and serve via ECF;	1.1	533.50
12/13/2021	Receive and review via ECF Order signed by Judge Wolfson granting tolling of fee petition filing by 30 days to 1/13/2022; docket same and legal analysis;	0.2	97.00
		Total	



Thurston Law Offices LLC
100 Springdale Rd A3
PMB 287
Cherry Hill NJ 08003

Invoice

Date	Invoice #
1/2/2022	2216

Bill To
M REDACTED REDACTED
1 Fairview Ave, Ste 14 Phillipsburg, NJ 08865-1230

Due Date
1/2/2022

Project	
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Service Date	Description	Time	Amount
12/16/2021	Strategy meeting and legal discussing re status of case and file review;	0.3	145.50
12/16/2021	Receive and review via email correspondence from WTBOE counsel re status of settlement negotiations and presentation to BOE;	0.1	48.50
12/16/2021	Receive and review via email correspondence to WTBOE counsel re settlement discussions;	0.1	48.50
12/19/2021	Prepare status report with legal analysis, strategy, and advice;	0.5	242.50
12/28/2021	Multiple correspondence exchanges re fee petition and pro forma for purposes of filing in federal court;	0.3	145.50
		Total	\$4,850.00



Thurston Law Offices LLC
100 Springdale Rd A3
PMB 287
Cherry Hill NJ 08003

Invoice

Date	Invoice #
2/6/2022	2236

Bill To
Micayla Augustyn c/o JOHN RUE & ASSOCIATES 1 Fairview Ave, Ste 14 Phillipsburg, NJ 08865-1230

Due Date
2/6/2022

Project	
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Service Date	Description	Time	Amount
1/3/2022	Review file and prepare status report to JRA and file with next steps items;	0.5	242.50
1/6/2022	Correspondence exchange and strategy discussion re fee application; legal analysis re same;	0.3	145.50
1/7/2022	Continue preparation of fee petition;	0.8	388.00
1/8/2022	Begin draft of fee application; review prior drafts and correspondence exchanges with co-counsel re strategy and legal advice;	1.5	727.50
1/9/2022	Continue preparation of fee application; review file and forms for compliance with local rules;	1.6	776.00
1/9/2022	Legal research and begin draft of fee petition; strategy discussion and legal analysis re scope of petition, necessary supporting certifications and documents, and related issues;	1.1	533.50
1/10/2022	Extensive strategy discussion and legal analysis re fee petition, tolling of time to file, settlement position, and interaction with WTBOE counsel;	2.2	1,067.00
1/10/2022	Prepare letter application to Court re extension of time / tolling of time to file fee petition; correspondence exchanged with WTBOE re changes and approval of final version; file and serve same via ECF;	0.4	194.00
1/10/2022	Strategy discussion, legal research, and legal analysis re fee petition issues;	0.6	291.00
1/11/2022	Receive and review via ECF Order granting extension of time / tolling of time to file fee petition; email to co-counsel re same and legal analysis;	0.2	97.00
1/13/2022	Multiple correspondence exchanges and draft fee petition certifications re filing fee petition;	0.5	242.50
1/17/2022	Legal strategy discussion re fee application certifications and status of application;	0.2	97.00
1/25/2022	Strategy discussion re status of settlement negotiations and fee petition and legal advice re same;	0.3	145.50
		Total	\$4,947.00



Invoice

Date	Invoice #
2/9/2022	2257

Bill To

M REDACTED A REDACTED
c/o JOHN RUE & ASSOCIATES
1 Fairview Ave, Ste 14
Phillipsburg, NJ 08865-1230

Due Date
2/9/2022

Project	
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[illegible]